

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,

v.

GREGORY COLBURN et al.,

Defendants.

Case No. 1:19-cr-10080-NMG

MOTION TO EXTEND TIME TO FILE POST-TRIAL MOTIONS

Pursuant to Federal Rule of Criminal Procedure 45(b), Defendants Gamal Abdelaziz and John Wilson (“Defendants”) respectfully request that the Court extend the time in which to file Defendants’ post-trial motions.

1. The Court has reserved on two pending motions for judgment of acquittal. *See* Defendants’ Motion for Judgment of Acquittal Under Federal Rule of Criminal Procedure 29, ECF No. 2330 (September 30, 2021); Defendants’ Renewed Motion for Judgment of Acquittal ECF No. 2351 (October 4, 2021). Pursuant to Federal Rule of Criminal Procedure 29(c), Defendants intend to renew and supplement these motions and, in addition, to file one or more motions for a new trial pursuant to Federal Rule of Criminal Procedure 33. Unless the Court extends the time in which to file these motions, they would be due 14 days after the return of the jury’s verdict, i.e., on October 22, 2021. *See* Fed. R. Crim. P. 29(c)(1), 33(b)(2).

2. Given the duration and complexity of the trial in this case, and the press of demands from other matters after defense counsel have returned from one month of trial, Defendants respectfully request additional time in which to prepare their post-trial motions. Defendants propose the following briefing schedule:

Defendants’ opening briefs: November 5, 2021

Government's response brief: November 26, 2021

Defendants' reply briefs: December 8, 2021

3. Counsel for Defendant John Wilson contacted counsel for the government on October 8, 2021 to seek the government's consent to this motion. As of the time of filing of this motion, Defendants had not received a response.

WHEREFORE, Defendants request that the Court grant this motion and set a briefing schedule as set forth above.

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Respectfully submitted,

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DATED: October 8, 2021

CERTIFICATE OF SERVICE

I, Michael Kendall, hereby certify that on October 8, 2021 this document, filed through the CM/ECF system, will be sent electronically to all registered participants in this matter as identified on the Notice of Electronic Filing (NEF).

/s/ Michael Kendall